

Lance J.M. Steinhart, P.C.

Attorney At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
and Maryland

Telephone: (770) 232-9200
Facsimile: (770) 232-9208
Email: lsteinhart@telecomcounsel.com

May 17, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket
No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, May 16, 2012, Lance Steinhart, John Nakahata, and Heather Kirby, on behalf of Four Star Marketing, LLC d/b/a Midsouth Home Phone ("Four Star" or the "Company"), as well as Joe Black, COO of Four Star, and Alex Rodriguez of CGM, LLC, spoke with Kimberly Scardino, Divya Shenoy, Garnet Hanley and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed Four Star's wireline Compliance Plan as filed on April 27, 2012.

Joe Black gave an overview of the Company and its operational history. Mr. Black highlighted Four Star's experience in the wireline industry, the technical expertise of its management team, and the Company's financial capability and strength of its investors. We discussed the process of receiving the Lifeline subsidy through an underlying carrier versus through USAC. Mr. Black emphasized the Company's commitment to comply with all FCC rules and to prevent waste, fraud, and abuse of the Lifeline program. We discussed Four Star's enrollment process and detailed procedures regarding fraud prevention. We also discussed Four Star's Certification form and suggested changes.

Alex Rodriguez demonstrated CGM's software for facilitating enrollment and proof of eligibility under the new rules, which Four Star intends to utilize.

Finally, Four Star agreed to have all suggested changes made to its Certification form and Compliance Plan and to file a revised Compliance Plan.

Attached is a copy of the presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Ms. Marlene H. Dortch
May 17, 2012
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Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Attorney for Four Star Marketing, LLC
d/b/a Midsouth Home Phone

Attachments

cc: Joe Black
John Nakahata
Kimberly Scardino
Divya Shenoy
Garnet Hanley
Jonathan Lechter



Presentation
before the
Federal
Communications
Commission
May 16, 2012

Agenda

- Introduction to Mid South Home Phone
- Financial Capability
- Technical Capability
- Lifeline Plans
- Marketing / Advertising Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A

Mid-South Home Phone

- Names and Identifiers:
 - Four Star Marketing, LLC
dba Mid-South Home Phone

Mid-South Home Phone

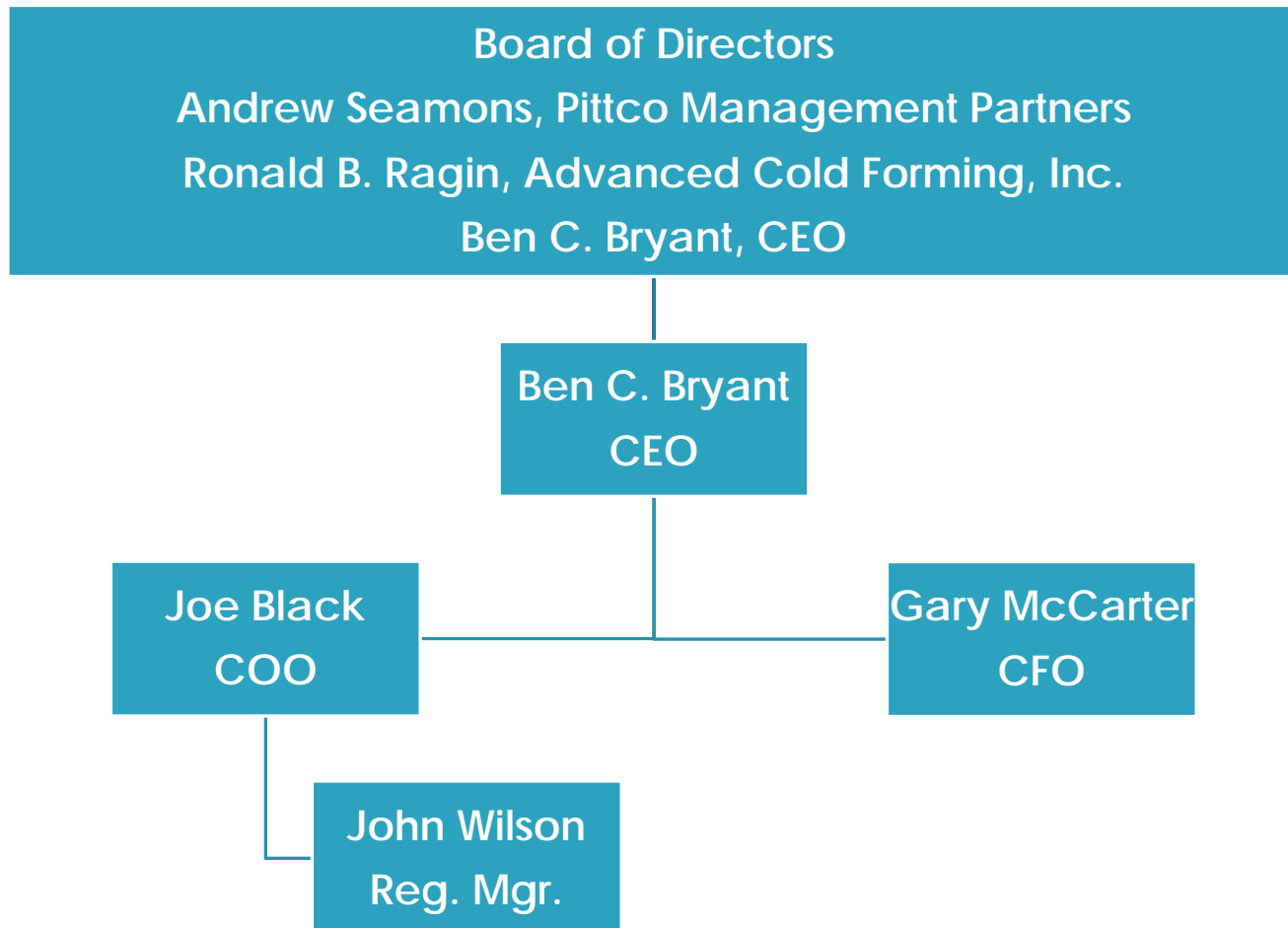
- In compliance with newly amended section 54.202, Four Star certifies:
 - It will comply with the service requirements applicable to the support that it receives;
 - It has the ability to remain functional in emergency situations;
 - It will satisfy applicable consumer protection and service quality standards; and
 - It is financially and technically capable of providing the Lifeline service.

Financial Capability

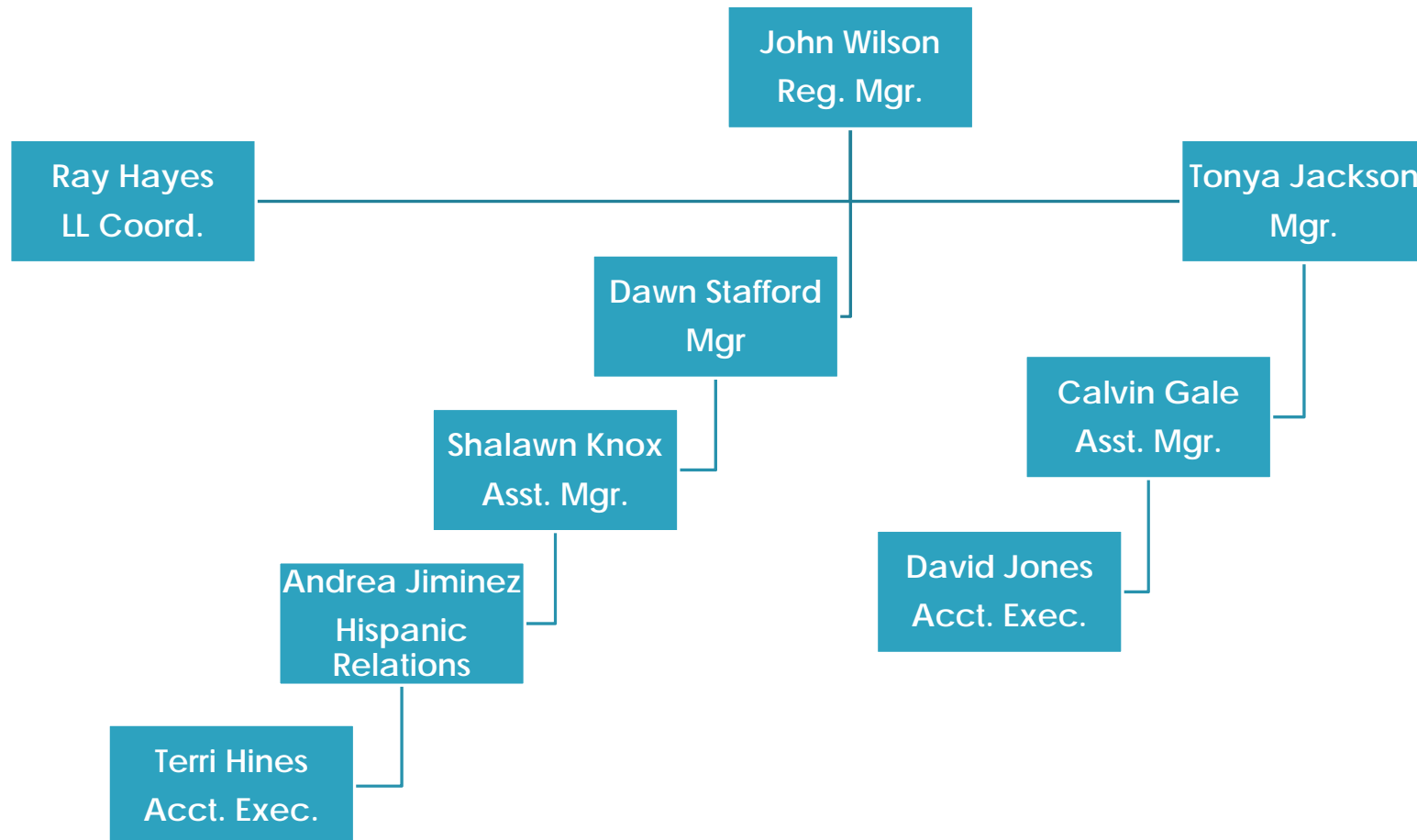
- Four Star is financially capable of providing the supported Lifeline service :
 - Financial Resources
 - Already providing service in Tennessee & Mississippi



Four Star Marketing, LLC dba Mid-South Home Phone Organization Chart



Four Star Marketing, LLC dba Mid-South Home Phone Organization Chart



Technical Capability

- Four Star is technically capable of providing the supported Lifeline service :
 - Key Management Experience
 - James Black, COO
 - Ben Bryant, CEO
 - Gary McCarter, CFO

Mid-South Home Phone lifeline plans

- **Four Star will apply the Lifeline discount to the selected retail rate plan**
 - maximum federal subsidy in effect, plus state subsidy where applicable
- **All plans include:**
 - Unlimited local calls
 - Set amount of toll calls



Mid-South Home Phone lifeline plans

PLAN	Local Minutes	Long Distance Minutes	Vertical Features	Retail Cost	Lifeline Cost*
Basic	Unlimited	60	None	\$33.45	\$19.95
Deuce	Unlimited	60	Caller ID, Call Waiting	\$44.40	\$30.90
Deluxe	Unlimited	60	Caller ID, Call Waiting 3-way Calling, Call Return	\$50.40	\$36.90
Ultra	Unlimited	60	Caller ID, Call Waiting 3-way Calling, Call Return Speed Dial, Call Forward Call Trace, Call Block	\$52.40	\$38.90

Mid-South Home Phone lifeline plans

- **Public Safety and 911 / E911 Access**
 - Four Star will provide its Lifeline customers with access to 911 and E911 services:
 - through its underlying carrier(s)
 - at the time of Lifeline service initiation

Marketing & Advertising plan

- **All materials will :**

- Disclose company name under which it does business;
- Explain in clear, easily understood language the following:
 - Only eligible consumer may enroll in the program;
 - The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - Lifeline is a government benefit program;
 - What documentation is necessary for enrollment;
 - Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

Marketing & Advertising plan



- Four Star intends to market its Lifeline service via:
 - TV
 - Outdoor signage
 - Internet

Enrolling lifeline customers

Eligibility Confirmation:

1. Confirm prospect's identity
(see government issued picture ID)
2. Confirm program or income eligibility
(see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household
4. Confirm prospect not currently receiving subsidy
(ask prospect, perform duplicate check at a minimum into an internal database)

Enrolling lifeline customers

End-User Education and Disclosures:

- Lifeline is a federal non-transferable benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government



Enrolling lifeline customers

- End User Attestations:
- See Certification Form



Please mail or fax this self-certification form to:

Mid-South Home Phone
3281 Jackson Ave
Memphis, TN 38122

901-562-1800 Toll Free 1-888-459-0001
FAX: (901) 328-8084

LIFELINE APPLICATION

This signed authorization is required in order to enroll you in Four Star Marketing, LLC dba Mid-South Home Phone's Lifeline Program in your state. This authorization is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by Company. I authorize the company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program.

Things to know about the Lifeline Program.

- (1) Lifeline is a federal benefit.
- (2) Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers, and
- (3) A household is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.

Applicant Information:

First Name _____ MI _____ Last Name _____ Date of Birth: Month _____ Day _____ Year _____

Social Security Number (or Tribal ID Number): _____ (XXX-XX-XXXX) Contact Telephone Number: _____

Residence Address (No P.O. Boxes, Must be your principal address): This address is ☐ Permanent ☐ Temporary ☐ Multi-Household

APT/Floor/Other _____ City _____ State _____ ZIP Code _____

Billing Address (May Contain P.O. Box) _____

APT/Floor/Other _____ City _____ State _____ ZIP Code _____

I hereby certify that I participate in at least one of the following programs: (Check all that apply)

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Supplemental Security Income (SSI)
- ☐ Federal Public Housing Assistance
- ☐ Low-Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program (Non program only)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Medicaid

I certify that my household income is at or below 135% of the Federal Poverty Guidelines (FPG). There are _____ individuals in my household.

I certify, under penalty of perjury *(initial by Each Certification)*

- (1) The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
- (2) I am a current recipient of the program checked above, or have an annual household income at or below 135 percent of the Federal Poverty Guidelines.
- (3) I have provided documentation of eligibility if required to do so.
- (4) I understand that I and my household can only have one Lifeline-supported telephone service. Mid-South Home Phone has explained the one-per-household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the lifeline program, and could result in criminal prosecution by the United States Government.
- (5) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline supported service from any other land line or wireless company such as Lifeline, Assurance, or ReachOut Wireless.
- (6) I understand my Mid-South Home Phone Lifeline service is a non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- (7) I will notify Mid-South Home Phone within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if:
 - (1) I cease to participate in the above federal or state program, or my annual household income exceeds 135% FPG
 - (2) I am receiving more than one Lifeline supported service,
 - (3) I no longer satisfy the criteria for receiving Lifeline support.
- (8) I will notify Mid-South Home Phone within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Mid-South Home Phone every ninety (90) days. If I fail to respond to Mid-South Home Phone's address verification attempts within thirty (30) days, my Mid-South Home Phone Lifeline service may be terminated.
- (9) Mid-South Home Phone has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in the termination of my Mid-South Home Phone Lifeline service.
- (10) I authorize and understand that Mid-South Home Phone may provide to state and Federal agencies, as required by law, for the purposes of complying with the Lifeline program all the information related to my account including but not limited to my name, date of birth, social security, usage history, address and phone number.
- (11) I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the Universal Service Administrator's Company (USAC) and/or its agents for the purpose of verifying that I do not receive more than one Lifeline subsidy.
- (12) I understand that, if USAC identifies I am receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other.

FOR OFFICE USE ONLY:

Company Representative _____

Documentation Verified: _____

Representative Signature: _____

Date: _____

Is this a multi-family dwelling? ☐

APPLICANT'S SIGNATURE _____

DATE _____

Recertifying lifeline customers

- **Annual Recertification Compliance:**
 - Four Star commits to re-certify the eligibility of all Lifeline customers (as of June 1, 2012) by the end of 2012 and report the results to USAC by January 31, 2013.
 - Four Star will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
 - All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
 - In addition, Four Star will continue to follow any state-specific requirements.

Preventing waste, fraud & abuse

- Four Star utilizes a diligent Enrollment Process
- Four Star's business model primarily employs direct, high quality contact (retail locations, over the phone/internet)
- Four Star has an ongoing billing relationship with its customers
- Four Star provides TLS to its customers
- Four Star emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, de-enrollment procedures

Preventing waste, fraud & abuse

Additional Measures to prevent Waste, Fraud & Abuse:

- Duplicates Database
 - National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
 - *if Four Star draws \$5 million+ on an annual basis



Questions?

PROCEDURE FOR VERIFICATION OF BENEFITS

- Account Executive (AE) receives inquiry phone call from prospect
- AE determines whether the prospect would be a LL subscriber or a non-LL subscriber by asking if they currently receive any of the qualifying forms of Government Assistance and advises the prospect they are required to provide proof of identity and verification of benefits before their service is activated.
- AE validates the prospects service address
- AE enters order information into H2o software:
 - Internal database check for identity duplicates
 - HOLD status – will not be released for provisioning until the Self Certification form w/the validation box signed and dated is uploaded to the customer record.
- AE IVR's the LL information via the state self certification form posted on our website: www.midsouthhomephone.com
- AE again advises customer they must provide proof of identity and verification of benefits (fax, email, photocopy) before their order will complete
- AE prints completed LL form awaiting verification – LL Coordinator files LL form by last name
- LL Coordinator mails the prospect a Welcome Letter along with a stamped return envelope for their convenience
- LL Coordinator receives validation from the customer – matches to the LL form – signs/dates validation box – uploads to the customer record – order completes